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United States Trustee for Region 17

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re:

JADOOTV, INC.,

Debtor.

Case No. No. 19-41283 WJL

Chapter 11

Date: February 8, 2023

Time: 10:30 A.M.

Place: In Person or by Zoom

Judge: William J. Lafferty

**DECLARATION OF KRISTIN A. MCABEE IN SUPPORT OF MOTION
OF THE UNITED STATES TRUSTEE, PURSUANT TO 11 U.S.C. § 1112(b) AND FEDERAL
RULES OF BANKRUPTCY PROCEDURE 1017(f) AND 9014, TO CONVERT
OR DISMISS CHAPTER 11 CASE**

I, Kristin A. McAbee, declare as follows:

1. I am employed as a Bankruptcy Analyst in the Fresno Office of the United States Trustee, Region 17 (the "UST"), and I am over the age of 18. I am the Bankruptcy Analyst assigned to the bankruptcy case of JaDooTV, Inc., Case No. 19-41283 WJL. I have personal knowledge of the facts set forth herein, and based on that personal knowledge, I assert that all such facts are true and correct to the

1 best of my knowledge. To the extent I base my testimony upon information and belief or upon
2 admissible evidence other than my personal knowledge, I will specifically so state.

3 2. As part of my duties as a Bankruptcy Analyst, I am responsible for the supervision of
4 chapter 11 cases in the Office of the United States Trustee, Region 17. This supervision includes:
5 monitoring chapter 11 cases; reviewing petitions, schedules, statements and related documents, and
6 pleadings filed by a chapter 11 debtor and other parties in interest; conducting the Initial Debtor
7 Interview and requesting documents related to the Interview; reviewing monthly operating reports and
8 post-confirmation quarterly reports; monitoring plans and disclosure statements; and other such other
9 actions as the United States Trustee deems appropriate.
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11 3. On January 9, 2023, I accessed the electronic docket for this case. Based on my review
12 of the docket, it appears that the Debtor's most recently filed operating report is for the month of
13 November 2022 filed as ECF No. 421 (the "November MOR"). It further appears that the Debtor has
14 not filed a plan or a disclosure statement.
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16 4. Based on my review of the November MOR, it appears that the Debtor reported having a
17 cash balance of \$144,401.
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19 5. Based on my review of the November MOR, it further appears that the Debtor reported
20 that its total cash receipts during the case have been \$7,411,334; and its total cash disbursements during
21 the case have been \$7,762,801.

22 6. Thus, based on the November MOR, by my calculation, it appears that the Debtor's
23 disbursements have exceeded its receipts by \$351,467 during the case (\$7,762,801 in disbursements
24 minus \$7,411,334 in receipts).
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26 7. I have reviewed the Debtor's amended Schedule A/B filed as ECF No. 64 in this case.
27 Based on my review of amended Schedule A/B, it appears that the Debtor had cash and cash equivalents
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1 with a value of \$513,135.30 as of the petition date.

2 8. Thus, based on the November MOR and amended Schedule A/B, by my calculation, it
3 appears that the Debtor's cash has declined by \$368,734.30 during this case (\$513,135.30 reported on
4 amended Schedule A/B *minus* \$144,401 reported on the October MOR).

5 9. On January 9, 2023, I accessed the electronic claims register for this case. Based on my
6 review of the claims register, it appears that nine claims have been filed in this case. It further appears
7 that the aggregate amount of those claims is \$14,869,126.45. It further appears that: (i) DISH Network
8 LLC filed a proof of claim for \$13,650,000; (ii) DISH Technologies L.L.C. filed a proof of claim for
9 \$500,000; and (iii) Sling TV L.L.C. filed a proof of claim for \$500,000.
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13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed on January 9, 2023, in Fresno, California.
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17 /s/ Kristin A. McAbee
18 Kristin A. McAbee
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